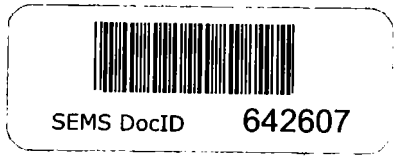
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203



February 15, 1984

Lawrence W. Bierlein, P.C.
1054 31st Street, NW
Washington, DC 20007

Dear Larry:

Pursuant to our conversation of February 10, 1984, I am sending you a copy of relevant provisions of an Order requiring monitoring, testing, analysis and reporting pursuant to §3013 of the Resource Conversation and Recovery Act, 42 U.S.C. §6934. The scope of these requirements may vary on a site specific basis, but it should nonetheless be sufficient to provide you with an understanding of EPA's approach.

As we discussed, EPA believes that the previous submittals by Carroll Products have been inadequate to define the nature and extent of the contamination problem at the site. While a phased approach may be acceptable, the initial level of effort will have to significantly exceed any of the proposals made to date. In additon, there must be a clear and concise articulation of the objectives of the proposed work. Toward that end, you should particularly note paragraph (J) of the attached.

While I hope that we may finally resolve this matter through a cooperative effort, please be advised that EPA is committed to an effective resolution of the problems at this site, without further delay.

Thank you for your assistance in this matter.

Sincerely,

Lauren Stiller Rikleen

Lauren Stiller Rikleen
Assistant Regional Counsel

Enclosure

9. By no later than , 1984, shall submit a proposal for the identification, sampling, analysis, and monitoring of hazardous wastes on and emanating from the site, (hereinafter "Remedial Investigation Plan"). The Remedial Investigation Plan shall be inclusive enough to provide, but not necessarily be limited to, the following:

A. A plan to further define the nature and extent of past on-site waste disposal areas in order to assess the potential that such disposal areas may have for future degradation of the environment.

Options that should be considered are:

(1) Geophysical surveys,

(2) Surface and subsurface soil and material sampling,

(3) Surface and ground-water sampling and chemical analysis, and,

(4) Surface and groundwater level and quality monitoring.

B. A description of the geologic materials on and underlying the Site and the affected surrounding area sufficient to characterize vertical and areal distribution of contaminated geologic materials and the nature of their contamination.

C. A description of the hydrology underlying the Site and the affected surrounding area sufficient to

characterize surface and groundwater movement and the pathways and mechanism of contaminant transport.

D. A description of surface and groundwater physical properties and chemical quality on and underlying the Site and the affected surrounding area sufficient to identify and characterize uncontaminated and chemically contaminated surface and groundwater.

E. A program to determine and monitor the direction of groundwater movement in all water-bearing zones in areas affected or likely to be affected by contaminants that are on, and that are or may have migrated from, the Site.

F. A program to sample and analyze ground and surface water and monitoring of groundwater quality in all water-bearing zones to detect contaminant movement in areas affected or likely to be affected by contaminants that are on, and that are or may have migrated from, the Site. Any program for monitoring shall provide for determining statistically significant evaluation of groundwater quality changes, in accordance with methods prescribed in 40 CFR §265.92-93, including EPA's guidance Memorandum dated November 30, 1983.

G. An evaluation of any migration of contaminants from areas determined to be contaminated.

H. Any environmentally related measurements submitted to EPA shall include technical descriptions of sampling and analytic procedures and procedures for quality assurance and quality control (hereinafter "QA/QC"). Environmentally related measurements are defined as all field and laboratory investigations that generate data.

shall submit a Quality Assurance Project Plan in accordance with EPA guidance document QAMS-005/80 and endeavor to ensure that EPA personnel are allowed access to the laboratory utilized by for analyses of samples collected during the monitoring program. In addition, the laboratory shall analyze samples provided by EPA under its Hazardous Waste Performance Evaluation Program.

I. Chemical analyses of liquid, sludge, and sediment and soil samples shall include analyses, where appropriate, to identify and quantify concentrations of EPA listed priority pollutant constituents, (hereinafter "priority pollutants"), as well as organic, inorganic and metal constituents in accordance with EPA approved methods.

Chemical analyses for organic and metal priority pollutants conducted on liquid samples analyzed shall be in accordance with methods prescribed by EPA in EPA

600/4-82-057, July 1982, and EPA 600/4-79-020, revised March 1983, respectively.

Chemical analyses for purgeable and extractable organic priority pollutants conducted on sludge and soil samples analyzed shall be in accordance with methods 624S and 625S prescribed by EPA in "Protocol for the analysis extractable organic priority pollutants in industrial and of purgeable and municipal wastewater treatment sludge," EPA Environmental Monitoring and Support Laboratory, Cincinnatti, Ohio, 1983.

Chemical analyses for inorganic and metal priority pollutant constituents conducted on sludge samples analyzed shall be in accordance with test methods prescribed in "Test Methods for Evaluating Solid Waste," EPA SW 846, July 1982.

shall submit to EPA procedures for analyses of organic, metal, and inorganic priority pollutant constituents in soils and sediments for EPA review and approval prior to sample analysis.

Splits of any samples collected shall be provided to EPA at EPA's request at the time of sampling. Splits of samples provided shall be preserved, packaged and labeled in accordance with the approved QA/QC Plan.

J. A proposal(s) describing plans to investigate and/or implement the items set forth above shall be submitted and shall include a proposal description and scope of work. The proposal description shall describe the problems to be addressed, investigation objectives, long-range investigative approach to be used, regular reporting schedules and other information that will assist with evaluation of investigation priorities and relevance. The scope of work shall describe proposed work tasks, address the issues raised in the proposal description, be technically specific, and contain sufficient detail to enable determination of investigation goals, needs, direction, status and schedule. Each work task described shall include, where applicable, descriptions of: technical approach; tests, measurements, sampling, and analyses planned; analytical techniques proposed; equipment to be used; design and construction of environmental monitoring sites; data needs; QA/QC plans; site safety and safety procedures; and means and frequency of regular reporting to EPA.

K. A proposed schedule for the implementation and completion of the items set forth above and for periodic and final reporting to EPA of all sampling and analytical results shall also be submitted.